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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RUSSELL G. GREER,

Plaintiff,

vs.

FREMANTLE PRODUCTIONS NORTH
AMERICA, INC., a corporation,

Defendant.

Case No. 2:21-cv-01905-RFB-NJK

**STIPULATION AND [PROPOSED]
ORDER REGARDING DEADLINES**

Plaintiff Russell G. Greer (hereinafter "Plaintiff"), in pro per person, and Defendant Fremantle Productions North America, Inc. (hereafter "Defendant"), by and through counsel, hereby agree and stipulate as follows:

WHEREAS, Plaintiff intends to seek leave of court to further amend his complaint to include, *inter alia*, Marathon Productions, Inc. ("Marathon") as a defendant to the lawsuit—the other party to Plaintiff's Audition Agreement for *America's Got Talent*;

WHEREAS, Plaintiff further intends to amend his motion for a preliminary injunction to include, *inter alia*, Marathon;

WHEREAS, the Parties are meeting and conferring about Plaintiff's proposed amendments to both the pending complaint and the motion;

1 WHEREAS, the Parties agree that—for party and judicial efficiency—Fremantle should
2 not respond to the pending complaint or motion for a preliminary injunction;

3 WHEREAS, the Parties are meeting and conferring about Fremantle’s anticipated motion
4 to compel arbitration pursuant to Greer’s Audition Agreement;

5 WHEREAS, the Parties agree to meet and confer about the timing for Fremantle’s
6 response to both the further amended complaint and amended motion, after Plaintiff files the
7 same, including whether the motion should be stayed pending resolution of Fremantle’s motion
8 to compel arbitration;

9 WHEREAS, should the Parties not be able to reach agreement, the Parties agree that
10 Fremantle’s deadlines to respond to the further amended complaint and amended motion shall be
11 pursuant to the Federal Rules of Civil Procedure, without prejudice to Fremantle’s right to seek
12 to extend and/or stay such deadlines.

13 Dated this 11th day of January 2022.

Dated this 11th day of January 2022.

14 RUSSELL G. GREER

H1 LAW GROUP

15 /s/ Russell G. Greer

/s/ Joel Z. Schwarz

16 Russell G, Greer
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19 *Pro Se Litigant*

Attorneys for Defendant

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22 **IT IS SO ORDERED:**

23
24 **UNITED STATES DISTRICT JUDGE**

25 Dated: _____
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27
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From: Russell Greer <russellgreer27@icloud.com>

Sent: Tuesday, January 11, 2022 5:49 PM

To: Lens, Molly M. <mlens@omm.com>

Cc: Russell Greer <russmark@gmail.com>; Joel Schwarz <joel@h1lawgroup.com>

Subject: Re: Question for your clients to ponder

[EXTERNAL MESSAGE]

Hello, yes that is fine for the stipulation re time

www.russellgreer.com

Sent from my iPhone

On Jan 11, 2022, at 5:18 PM, Lens, Molly M. <mlens@omm.com> wrote:

Russell –

Thank you for confirming your agreement that Fremantle need not respond to the motion for a preliminary injunction until after you've amended it. And, yes, Fremantle agrees not to move to compel arbitration until after the court decides whether to accept your further amended complaint. I've gone ahead and prepared the attached short stipulation, memorializing the parties' agreements. Can you please confirm we have approval to /s/ sign on your behalf? I'd like to get this on file today.

Otherwise, I'll call you tomorrow or Thursday to discuss the service issue, and I'd also like to continue our conversation about arbitration.

Thanks,

Molly

Molly M. Lens

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